

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**TATIA LIPE,**

**Plaintiff,**

**v.**

**Case No. 1:23-cv-00899-GBW-JMR**

**ALBUQUERQUE PUBLIC SCHOOLS,**

**Defendant.**

**NOTICE TO VACATE AND RESCHEDULE DEPOSITION**

To: **Tatia Lipe**  
c/o Boglarka Foghi, Esq.  
Foghi Law Firm, LLC  
P.O. Box 944  
Corrales, NM 87508-0944  
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NOTICE IS HEREBY GIVEN that Defendant Albuquerque Public Schools hereby vacates the deposition of Plaintiff Tatia Lipe, which was noticed to take place on Tuesday, September 16, 2025 beginning at 10:30 a.m. before a certified court reporter and reschedules the deposition of Plaintiff for **Thursday, October 23, 2025 beginning at 10:30 a.m.** and continuing from day to day thereafter until completed, before a certified Court Reporter, pursuant to the Federal Rules of Civil Procedure, at the offices of Cuddy & McCarthy, LLP, 201 Third Street NW #1300, Albuquerque, New Mexico 87102. Notice is further given that this deposition testimony may be used at trial for any and all purposes permitted by the Federal Rules of Civil Procedure.

Respectfully submitted:

CUDDY & McCARTHY, LLP

By: /s/ M. Karen Kilgore  
M. KAREN KILGORE  
Attorneys for Defendant  
Post Office Box 4160  
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**CERTIFICATE OF SERVICE**

I certify that on the 10th day of September 2025, the foregoing Notice to Vacate and Reschedule Deposition was emailed to the following counsel of record:

Boglarka Foghi, Esq.  
Foghi Law Firm, LLC  
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[foghilaw@yahoo.com](mailto:foghilaw@yahoo.com)

/s/ M. Karen Kilgore  
M. KAREN KILGORE